

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

SHAWNEE TELEPHONE COMPANY )

Petition For Suspension Or Modification of )  
Section 251(b)(2) requirements of the Federal )  
Telecommunications Act pursuant to Section )  
251(f)(2) of said Act; for entry of Interim )  
Order; and for other necessary relief. )

Docket No. 04-0236

OFFICIAL FILE  
ILL. C. C. DOCKET NO. 04-0236  
Shawnee Exhibit No. 1  
Witness \_\_\_\_\_  
Date 4/7/04 Reporter Red

DIRECT TESTIMONY

OF

MICHAEL GUFFY

FOR

SHAWNEE TELEPHONE COMPANY

April 20, 2004

47 Q. Please state your name and business address.

48 A. My name is Michael Guffy, and my business address is Schwartz Ventures, Inc.,  
49 5885 North State Route 159, Edwardsville, Illinois 62025.

50

51 Q. By whom are you employed and in what capacity?

52 A. I am a Senior Management Consultant for Schwartz Ventures, Inc., a consulting  
53 firm specializing in working with small telephone companies.

54

55 Q. Would you please outline your educational background and business experience.

56 A. A graduate from Iowa State University in 1984, I was employed as a General  
57 Accounting Manager for CCS Telephone Company in Jackson, Michigan, a  
58 17,000 access line independent telephone company from 1984 through 1987. I  
59 then began my consulting career with Interstate Telephone Consulting, Inc. As a  
60 consultant for the past 17 years, I have become familiar with state regulatory  
61 plans throughout the Midwest, including Wisconsin, Minnesota, Michigan, Iowa,  
62 Indiana and Illinois. My involvement in telecommunications has encompassed  
63 cost study preparation, meet point billing negotiations, intraLATA toll issues, and  
64 state and federal tariff submissions. Additionally, I continue to be involved in all  
65 aspects of the expanding telecommunications marketplace, including wireless, toll  
66 resale and cable television.

67

68 Q. On whose behalf are you providing testimony in this proceeding?

69 A. I am providing testimony on behalf of and in support of the Petition filed by  
70 Shawnee Telephone Company ("Shawnee"). Our firm has provided consulting  
71 services to Shawnee in connection with the subject matter of this proceeding and I  
72 performed the incremental cost analysis regarding the costs to Shawnee of  
73 providing wireline-to-wireless local number portability based upon information I  
74 have received from the company and others, which I will subsequently be  
75 introducing and discussing in my testimony.

76  
77 Q. For the record and to provide background, did an Order of the Federal  
78 Communications Commission entered in November, 2003 lead to the filing of the  
79 Petition in this docket requesting a suspension or modification of the Section  
80 251(b)(2) requirements related to the provision of wireline-to-wireless number  
81 portability pursuant to Section 251(f)(2) of the Federal Telecommunications Act?

82 A. Yes, that is correct. The FCC on November 10, 2003 in response to a CTIA  
83 Petition For Declaratory Rulings On Wireline-Wireless Porting Issues released a  
84 Memorandum Opinion and Order and Further Notice of Proposed Rulemaking in  
85 CC Docket No. 95-116. As it pertains to the Top 100 MSAs in the country, the  
86 November 10, 2003 FCC Order concluded, in part, as follows at paragraph 22:  
87 "We conclude that, as of November 24, 2003, LECs must port numbers to  
88 wireless carriers where the requesting wireless carrier's "coverage area" overlaps  
89 the geographic location of the rate center in which the customer's wireline  
90 number is provisioned, provided that the porting-in carrier maintains the numbers  
91 original rate center designation following the port."

92

93 For companies whose service territories are not located within a Top 100 MSA,  
94 the date for a provision of wireline-to-wireless local number portability was  
95 established as the later of six months after receipt of a bona fide request or May  
96 24, 2004. The FCC, in a subsequent Order, extended the November 24, 2003 date  
97 to the later of six months after receipt of a bona fide request or May 24, 2004 for  
98 rural telephone companies in the Top 100 MSAs, as well.

99

100 Q. Is Shawnee's service territory located within a Top 100 MSA?

101 A. No, it is not.

102

103 Q. For the record, please provide a description of Shawnee and its operations.

104 A. Shawnee is a small telephone company and a facilities-based incumbent local  
105 exchange carrier providing local exchange telecommunications services as  
106 defined in Section 13-204 of The Illinois Public Utilities Act ("Act") subject to  
107 the jurisdiction of the Commission. Shawnee provides service in its Hicks,  
108 Leamington, Equality, Rosiclare, Elizabethtown, Cave-in-Rock, Eddyville,  
109 Simpson and Renshaw exchanges. As of December 31, 2003, Shawnee provided  
110 service to approximately 4,526 access lines. Shawnee's service area consists of  
111 approximately 508 square miles and is sparsely populated with just under nine  
112 access lines per square mile.

113

114 Q. Is Shawnee a “rural telephone company” within the meaning of Section 153(47)  
115 of the Federal Act and Section 51.5 of the Rules of the Federal Communications  
116 Commission?

117 A. While I am not an attorney, it is my understanding that Shawnee is a “rural  
118 telephone company” within the meaning of the Federal Act and the FCC’s Rules.

119

120 Q. As a rural telephone company, does Shawnee possess a “rural exemption” of the  
121 251(c) obligations pursuant to Section 251(f)(1)(A) of the Federal Act?

122 A. While once again I am not an attorney, it is my understanding that Shawnee  
123 possesses a “rural exemption” pursuant to the terms of the Federal Act.

124

125 Q. Has Shawnee received a Section 251(c) *bona fide* request for interconnection,  
126 services or network elements from any telecommunications carrier?

127 A. No, it has not.

128

129 Q. Has any telecommunications carrier requested this Commission to terminate  
130 Shawnee’s rural exemption pursuant to the provisions of Section 251(f)(1)(B) of  
131 the Federal Act?

132 A. No, they have not.

133

134 Q. Has any wireline telecommunications carrier requested Shawnee to provide  
135 number portability?

136 A. No, they have not.

137

138 Q. Has Shawnee received correspondence or inquiries from wireless carriers, which  
139 taken into consideration the content of the November 10, 2003 FCC Order, could  
140 be interpreted to be requests for wireline-to-wireless local number portability?

141 A. Yes, Shawnee has received those kinds of documents from Verizon Wireless. It  
142 was an oversight on the part of Shawnee not to indicate that documents had been  
143 received from Verizon Wireless in the Petition filed herein. Again, while I am not  
144 an attorney, I want to note for the record that the FCC's November 10, 2003  
145 Order did not amend its pre-existing rules related to number portability.

146

147 Q. Are you attaching to your testimony the correspondence and other documents that  
148 Shawnee received from wireless carriers?

149 A. Yes, I am. The correspondence and other documents that Shawnee received from  
150 Verizon Wireless are appended to my testimony as Shawnee Attachment 2.  
151 (Response to Staff Data Request 1.12)

152

153 The above-referenced Staff Data Requests asks that Shawnee detail "all facts"  
154 that suggest correspondence and other documents contained in Attachment 2  
155 "could constitute" requests for wireline-to-wireless local number portability. The  
156 facts are the correspondence and the attached documents that constitute Shawnee  
157 Attachment 2, which on their face appear to be "requests for wireline-to-wireless  
158 local number portability". (Further response to Staff Data Request 1.12)

159

160 Q. Has Shawnee filed with the FCC a formal challenge against the correspondence  
161 and other documents contained in Attachment 2 as insufficient to constitute a  
162 bona fide request for wireline-to-wireless local number portability?

163 A. No. (Response to Staff Data Request 1.13)

164

165 Q. Why has Shawnee not filed such a challenge or challenges?

166 A. Assuming that "challenge" means that Shawnee would make some filing with the  
167 FCC seeking a ruling that the correspondence and other documents contained  
168 within Attachment 2 do not constitute a bona fide request for wireline-to-wireless  
169 local number portability, Shawnee has been advised by counsel that such a filing  
170 would not be proper or prudent at this time. (Further Response to Staff Data  
171 Request 1.13)

172

173 Q. Does Verizon Wireless have a point of interconnection in Shawnee's serving  
174 territory or numbering resources from Shawnee at the time this testimony is being  
175 filed?

176 A. No, it does not.

177

178 Q. Does any wireless carrier have a point of interconnection within Shawnee's  
179 serving territory or numbering resources from Shawnee at the time this testimony  
180 is being filed?

181 A. No.

182

183 Q. As a practical matter, what is the consequence of a wireless carrier not having a  
184 point of interconnection or numbering resources within the serving territory or  
185 exchange from which a number is ported?

186 A. It is my understanding that as a practical matter it means that a call to such a  
187 ported number from another Shawnee customer would have to be routed to a  
188 location or a point of interconnection outside of Shawnee's serving territory  
189 where the wireless carrier does have a point of interconnection. The routing of a  
190 call to a location outside of Shawnee's local calling area would normally lead to  
191 such a call being rated as an interexchange call or toll call.

192

193 Q. Is Shawnee requesting that this Commission make a determination in this docket  
194 as to whether the correspondence and documents received from Verizon Wireless,  
195 or any similar documents that may subsequently be received from other wireless  
196 carriers, constitute a bona fide or specific request for wireline-to-wireless number  
197 portability in accordance with the FCC's rules?

198 A. No, we are not. Shawnee is requesting that in the final Order entered in this  
199 docket that the Commission grant Shawnee a suspension or modification of the  
200 wireline-to-wireless local number portability requirements of Section 251(b)(2)  
201 pursuant to Section 251(f)(2) of the Federal Act until November 24, 2006. In our  
202 opinion, the focus of the proceeding should be on that request for relief.

203



204 Q. Are you familiar with the wireline-to-wireless local number portability suspension  
205 dockets initiated earlier by the five Illinois small companies who have a presence  
206 in the St. Louis MSA, which is a Top 100 MSA?

207 A. Yes, I am. In fact, I presented Direct and Rebuttal Testimony on behalf of  
208 Madison Telephone Company in Docket No. 03-0730 and am familiar with the  
209 testimony submitted by the Staff witnesses in that docket as well as similar  
210 testimony submitted in the other small company dockets. I will make reference  
211 to the testimony submitted by Staff witness Jeff Hoagg concerning policy issues  
212 and the Staff's ultimate recommendations in the Madison docket and the other  
213 dockets and to the testimony of Robert Koch commenting on and responding to  
214 the incremental cost analysis submitted by Madison in that docket subsequently in  
215 my testimony.

216  
217 At the February 23, 2004 hearing in the Madison docket, I submitted  
218 supplemental oral testimony as did Staff witness Hoagg concerning Madison's  
219 and the Staff's final recommendations to the Commission with regard to the  
220 requested suspension. Both Mr. Hoagg and I were questioned by the  
221 Administrative Law Judge at the hearing, and I am familiar with the responses  
222 each of us gave, as well as the responses given in the other four company dockets  
223 by the companies' witnesses and Mr. Hoagg.

224

225 Q. For the record, would you please indicate the four other docket numbers in which  
226 hearings have been completed with regard to requests for suspension of the  
227 wireline-to-wireless local number portability requirements.

228 A. The Petition of Egyptian Telephone Cooperative Association was heard in Docket  
229 No. 03-0726. The Petition of Harrisonville Telephone Company was heard in  
230 Docket No. 03-0731. The Petition of Alhambra-Grantfork Telephone Company  
231 was heard in Docket No. 03-0732, and the Petition of Home Telephone Company  
232 was heard in Docket No. 03-0733.

233

234 Q. In addition to your involvement in the Madison docket and your familiarity with  
235 the other four previous dockets, have you also had discussions with  
236 representatives of other small companies who have more recently filed Petitions  
237 with the Commission requesting similar relief to what is being sought by Shawnee  
238 with regard to wireline-to-wireless number portability?

239 A. Yes, I have. In light of Shawnee's and all of the other small companies' lack of  
240 experience in providing local number portability and our limited resources, we  
241 have relied not only on the efforts of the five companies who had initially filed,  
242 but the experience of other companies and their consultants and advisors in  
243 pooling information and making certain that we are all correctly identifying the  
244 activities and costs involved in the provision of wireline-to-wireless local number  
245 portability. To the extent we have made estimates or assumptions concerning  
246 certain of the costs, we have, in part, used the information available from the  
247 other dockets, taking into account the Staff's response as well as Shawnee's

specific information in developing the appropriate estimates or assumptions. We have also relied upon information provided to us and other carriers who have previously or are now seeking suspensions and from vendors and Associations with expertise in the area and from the National Exchange Carriers Association (NECA).

Q. With regard to Shawnee's request for a suspension or modification of any obligation it may have to provide wireline-to-wireless number portability, please describe Shawnee's basic position.

A. It is Shawnee's position that a small company, such as Shawnee, should not be required to provide wireline-to-wireless local number portability within its serving area until such time as operational and administrative problems associated with its provision have been worked out on a more global basis by the larger incumbent local exchange carriers, such as SBC, and the large wireless carriers requesting number portability. As I previously indicated in my testimony, companies such as SBC have been providing some type of local number portability for a number of years. Those companies have already made the incremental investments to provide local number portability and have trained employees and have had ongoing business experience in the provision of at least some type of local number portability. Shawnee has not had the obligation to provide any type of number portability, and therefore, has not incurred the incremental costs nor does it have the background and experience in the provision of any type of local number portability. In Shawnee's view, from a policy and

industry perspective, this would appear to be similar to the situation when customers were initially allowed to presubscribe to interexchange carriers. Presubscription was initially implemented by the large carriers, such as the RBOCs; and the operational, administrative and other difficulties associated with presubscription were worked out over a period of time between those large incumbent local exchange carriers and the large interexchange carriers, such as AT&T, MCI and Sprint. In connection with determinations related to the Primary Toll Carrier Plan in Illinois, this Commission provided a different and subsequent timetable of presubscription for small companies, such as Shawnee, after experience had been gained from the larger companies.

Second, it is Shawnee's position that it should in no event be required to provide wireline-to-wireless local number portability until such time as regulatory decisions have been made and mechanisms put in place that will allow Shawnee to recover all of its costs, not just some of its costs, associated with the provision of wireline-to-wireless local number portability. The FCC's Orders to date, including the November, 2003 Order, fail to address how the cost of transporting calls to wireless points of interconnection outside of the incumbent local exchange carriers' serving area and associated transiting or tandem switching costs, will be recovered. While it is Shawnee's belief that those costs should not be borne by Shawnee or its customers, no regulatory decision by the FCC or this Commission has been made as to how those costs will be recovered and mechanisms put in place to allow for such recovery. By granting this extension,

the ICC will allow time for the FCC and the Federal Courts to clarify a number of these issues pending in the FCC's Further Notice and any court appeals for clarification on the current Orders.

Third, the evidence I will be submitting will demonstrate that the additional or marginal costs to Shawnee of providing wireline-to-wireless number portability are significant for a company of Shawnee's size and would be unduly economically burdensome upon the company and its end user customers. The evidence will show that although Shawnee does not believe all of the incremental costs of providing wireline-to-wireless local number portability should be borne by its customers, that lacking regulatory determinations that the costs may be recovered in some other manner, recovery of those costs from Shawnee's end user customers would have a significant adverse economic impact upon them. The granting of a suspension or modification is not only consistent with the statutory criteria of Section 251(f)(2)(A) but would also be consistent with the public interest, convenience and necessity.

Finally and related to the above, it is Shawnee's position that a small company, such as Shawnee, should not be required to provide wireline-to-wireless local number portability until there is a demonstrated desire or demand for that service from our customers. Staff witness Hoagg, in the dockets regarding Madison's request and the requests of the other four companies, submitted testimony that indicated there were extremely low "take rates" by both Verizon subscribers

(.02% in January, 2004) and by SBC customers throughout its Midwest Region of .017%. Shawnee sees no evidence that there is any significant demand for wireline-to-wireless number portability within its serving area. Up until this time, Shawnee has not received any requests from customers that want to port their wireline number to their wireless service. Shawnee would be willing to provide the service at such time as there is a demonstrated demand from our customers for the service together with a willingness by all of Shawnee's customers to pay for the service. However, it is Shawnee's position that Shawnee should not be required to provide the service until such a demand is demonstrated, since the adverse economic impact on Shawnee's customers to recover from them the incremental costs associated with the provision of the service would be even more contrary to the public interest if there was little or no demand for the service.

Q. Identify and describe in detail Shawnee's efforts to determine its customers' demand for wireline-to-wireless local number portability.

A. Shawnee has determined from its service representatives that they have received no inquiries from customers asking about wireline-to-wireless number portability. Shawnee is a small company and has not undertaken any official inquiry or survey from its customers at this time. However, as a small company, Shawnee is very familiar with its customer base and sees no evidence that there is any reason to believe that there will be any significant demand for wireline-to-wireless number portability within its serving area. (Response to Staff Data Request 1.14)

340 Q. Please provide a general description of what Shawnee would be required to do  
341 and the types of costs that would be incurred by Shawnee to provide wireline-to-  
342 wireless number portability in its serving area.

343 A. Shawnee has a Siemens DCO host switch located in its Rosiclare exchange, with  
344 remote switches located in its Hicks, Leamington, Equality, Elizabethtown, Cave-  
345 in-Rock, Eddyville, Simpson and Renshaw exchanges. While Shawnee has the  
346 most current generic software in its Rosiclare host switch, the LNP software  
347 functionality has not been implemented and therefore Shawnee's switch will not  
348 accommodate number portability. Shawnee would have to purchase an additional  
349 software feature to allow for the provision of local number portability from  
350 Siemens. As I will discuss subsequently in connection with the costs involved,  
351 Shawnee would also need Siemens personnel to load and activate that capability.  
352 Siemens personnel would also need to make translations in the switch and  
353 perform testing and verification. Shawnee would want its local engineers  
354 involved in the testing and verification process.

355

356 Shawnee would need to file an application with NPAC and sign agreements to  
357 access the NPAC Service Management System (SMS). Shawnee would need to  
358 decide whether to enter into an agreement with a vendor to provide local number  
359 portability Service Order Administration (SOA) services. There will be costs  
360 associated with accessing the SMS and costs associated with the SOA process.  
361 Since calls to ported numbers would need to have a LNP data base dip in  
362 connection with the provision of number portability, Shawnee would need to enter

363 into an agreement with an LNP database provider which would include the query  
364 charges. There would need to be additional coordination and testing, including  
365 testing with any wireless carrier desiring wireline-to-wireless local number  
366 portability. The various agreements that Shawnee would need to enter into would  
367 need to be dealt with and reviewed by legal counsel prior to the implementation of  
368 local number portability.

369  
370 Query costs will be incurred on a going-forward basis when a Shawnee customer  
371 calls a number that has been ported. Administrative, order processing, customer  
372 service, regulatory and legal costs will be incurred by Shawnee in connection with  
373 any requirement to implement and provide wireline-to-wireless local number  
374 portability. In addition, appropriate training of technical personnel would need to  
375 occur as well as appropriate training of other Shawnee personnel.

376  
377 Customer education efforts will have to be undertaken, not only in connection  
378 with any initial offering of wireline-to-wireless number portability, but on an  
379 ongoing basis, as well. There will be ongoing operational and technical costs  
380 involved in the provision of local number portability associated with potential  
381 technical trouble resolution.

382  
383 In addition, there are the transport and transiting costs, which I will be discussing  
384 subsequently in my testimony. The above is a very general and broad description  
385 of the types of activities and costs that Shawnee would incur.



386

387 Q. If Shawnee were to be required to implement wireline-to-wireless local number  
388 portability, what is your understanding as to how a Shawnee landline customer  
389 call to a Shawnee number that had been ported to a wireless carrier would be  
390 delivered to the wireless carrier?

391 A. The FCC's Orders and Rules as they now stand do not require a wireless carrier to  
392 have a point of presence within Shawnee's area nor do they require the wireless  
393 carrier to establish direct trunks to Shawnee for the purpose of delivering calls.  
394 Since no wireless carrier has a point of interconnection or numbering resources in  
395 Shawnee's serving area, Shawnee believes, based upon the FCC's current  
396 requirements, that all calls from Shawnee wireline customers to a Shawnee  
397 customer, who had ported his/her number to a wireless carrier, would have to be  
398 transported to the tandem that the particular Shawnee exchange subtends for  
399 delivery to the wireless carrier. The Rosiclare host switch subtends the Verizon  
400 tandem in Carbondale, Illinois, and therefore, calls to numbers ported to wireless  
401 carriers from all of the Shawnee exchanges would have to be delivered to the  
402 Verizon tandem in Carbondale for delivery to the wireless carrier.

403

404 Based upon our understanding and based upon the information that small  
405 company representatives have obtained regarding Verizon, it is my belief that  
406 initially common transport facilities provided by both Shawnee and Verizon  
407 would be used to transport calls to the Verizon tandem and that tandem switching  
408 facilities provided by Verizon would need to be used to transit the call to a

particular wireless carrier. In the cost analysis I will be presenting, I have estimated the transport and transiting costs based upon the rate elements and rates that we understand Verizon would charge and Shawnee's access rates for transport for the calls that would need to be delivered to the Carbondale tandem.

Q. So the record is clear, is it your understanding that neither the FCC, nor this Commission, has to date determined the responsibility for the payment of those types of costs and any associated intercarrier compensation for the transport of calls nor has a determination been made as to how those costs should be recovered?

A. That is correct. It is my understanding that neither the FCC, nor this Commission, has to date determined the responsibility for those costs or how they are to be recovered.

Q. Does Shawnee believe that the company, and ultimately its end user customers, should be responsible for those transport, transiting and related costs?

A. No. We believe those costs should not be the responsibility of Shawnee and/or its end user customers. However, at this point in time and for the purpose of projecting the estimated costs involved in the provision of wireline-to-wireless local number portability, we have had no choice but to assume the worst case scenario in which Shawnee would be responsible for the costs of delivering those calls to the wireless carrier and ultimately recovering those costs from our end user customers. As I stated earlier in my testimony, it is Shawnee's more basic

position that we should not be required to provide wireline-to-wireless number portability until such time as determinations have been made as to how the transport and transiting costs are to be recovered and mechanisms are in place that will allow Shawnee to recover these costs.

Q. Has Shawnee attempted to estimate the costs that would be involved for Shawnee to provide wireline-to-wireless local number portability, and in turn, the potential amount that would have to be recovered from each of Shawnee's customers per month to recover those costs?

A. Yes, we have. While certain of the costs are based upon information we have received from vendors, we have had to estimate a number of the incremental costs and make certain assumptions regarding the quantity of numbers that would be ported and the traffic to those numbers from other Shawnee customers. As a result, the analysis I am providing is what I would characterize as Shawnee's "best estimate" of the costs involved and the potential amount that would have to be recovered from Shawnee's customers.

Q. What model or methodology have you used in preparing the costs estimate?

A. The FCC has had rules in place for some time regarding local number portability cost recovery for landline-to-landline number portability pursuant to which a federal end user surcharge could be tariffed and filed for that cost recovery. Those rules contain certain investment costs and certain ongoing expenses to be recovered via an end user surcharge to be in place for a five year period of time.

455 Present value calculations are involved in establishing the surcharge. We have  
456 used that type of methodology in order to estimate the costs over a five year  
457 period of time and the amount of a potential customer surcharge. We have  
458 included all of the incremental costs that Shawnee believes would be incurred.  
459

460 Q. Does the FCC's methodology address the recovery of the transport and transiting  
461 costs you previously discussed?

462 A. No, it does not. As I previously indicated, no determination has been made by the  
463 FCC, nor this Commission, concerning the recovery of those costs. However, for  
464 the reasons I previously stated, we have estimated the amount of those costs over  
465 a five year period of time and included them within the calculations, since under a  
466 worst case scenario, they would have to be recovered from Shawnee's end users.

467  
468 While we have used the FCC methodology, the purpose was not to establish the  
469 amount that could be recovered under the FCC's Rules but rather the amount,  
470 which in some fashion whether it be through surcharges or increases in basic  
471 rates, would have to be recovered from Shawnee's end user customers.

472

473 Q. Has Shawnee used a particular model in making its costs estimates?

474 A. Yes, we have. Our model is based on cost support filed and approved by the  
475 National Exchange Carriers Association (NECA) in a local number portability  
476 filing, which they made with the FCC in NECA's Transmittal #956. The NECA

477 model has been used by individual companies to file their federal surcharges, and  
478 as a result, we felt it was appropriate for use.

479

480 I would like to note that this is the same model that was used by Madison and the  
481 other four companies in the prior LNP suspension filings and reviewed by the  
482 Commission Staff.

483

484 Q. So that the record is clear, is Shawnee requesting this Commission to approve the  
485 cost estimates it is submitting as its incremental costs of providing wireline-to-  
486 wireless local number portability?

487 A. No, we are not. The estimates are being submitted to provide the Commission the  
488 best estimates we have of the incremental costs Shawnee would incur and the  
489 estimated amounts Shawnee would have to recover from its customers if Shawnee  
490 were required to provide wireline-to-wireless local number portability at this time.  
491 The information is also submitted in light of the statutory criteria contained in  
492 Section 251(f)(2) of the Federal Act pursuant to which Shawnee is seeking a  
493 further suspension or modification of the wireline-to-wireless local number  
494 portability requirements.

495

496 Q. For a similar reason, would you indicate for the record whether Shawnee is  
497 requesting that the Commission approve any type of end user surcharge, or  
498 increased customer rate, connected with the provision of wireline-to-wireless

499 local number portability or find that any such amount is appropriate to be  
500 recovered under the federal surcharge.

501 A. No, we are not. The information is being presented for the reasons I previously  
502 indicated, and most specifically, not to ask that the Commission approve some  
503 type of end user rate increase and/or surcharge or find that a surcharge amount is  
504 appropriate if tariffed at the federal level.

505

506 Q. For the record, please identify Attachment 1 to Shawnee Exhibit 1.

507 A. Attachment 1 is Shawnee's exhibit estimating the total costs to Shawnee of  
508 providing wireline-to-wireless local number portability. Attachment 1 is five (5)  
509 pages in length. The first page of the Attachment entitled "Shawnee Telephone  
510 Company Local Number Portability Data Summary" sets forth the total costs that  
511 Shawnee has projected as I previously described. As can be seen from looking at  
512 that page of the exhibit, there are initial local number portability start-up costs,  
513 both in the Investments and Expenses categories and then certain ongoing  
514 expenses over the five year period of time. After applying present value factors,  
515 the cost is \$555,902.

516

517 As shown at the bottom right-hand corner of that page of the Attachment,  
518 Shawnee would have to recover \$3.02 per month from each access line either by  
519 means of a surcharge or a rate increase to recover the costs as described. It is  
520 Shawnee's position that the Commission should find that a further suspension or  
521 modification of any obligation Shawnee may have to provide wireline-to-wireless

local number portability is necessary to avoid a significant adverse economic impact on Shawnee's customers or to avoid imposing a requirement that is unduly economically burdensome on Shawnee and that the granting of such further suspension is consistent with the public interest, convenience and necessity.

The remaining pages of Attachment 1 contain schedules and information of a back-up or workpaper nature while those materials might not normally be submitted into the record or provided initially. In light of the time constraints of the proceeding, we have included those materials so they would be available to the Staff and the Administrative Law Judge at the earliest possible time.

Q. I am now going to ask you questions concerning each of the line items on page 1 of Attachment 1. What costs are connected with the line item "LNP Software" and how were those costs estimated?

A. This is the loading or activation of the local number portability capability within Shawnee's Rosiclare host switch, which I previously referred to. The cost of \$46,938 is a quote from Siemens to Shawnee. This quote from Siemens includes the work they would perform in connection with translations and testing and verification, as well; but since it was a composite quote, I have included it within this cost category.

Q. What are the costs associated with the category "Switch Translations"?

544 A. There will be an additional charge to the switch cost calculated above of \$3,000.  
545 As I previously indicated, the cost to have Siemens personnel do the necessary  
546 translations and associated testing and verification is included in the total quote  
547 from Siemens, which I have included in the LNP software line item of  
548 Attachment 1. In addition, Shawnee will need personnel from its consulting  
549 engineering firm to be involved in the testing and verification process. Based  
550 upon conversations with Shawnee's consulting engineer, Charlie Watts, and the  
551 amount of testing and verification that would be involved, we believe that an  
552 additional cost of \$3,000 for the Rosiclare host office would be incurred.

553  
554 Q. Are the query and transport and transit expenses you have estimated and which  
555 are included on the first page of Attachment 1 related to or driven by demand?

556 A. Yes, they are. As a result, we have had to make an assumption or estimate of the  
557 number of customers who would potentially port to a wireless carrier and the  
558 volume and duration of the calls from other Shawnee customers to those ported  
559 numbers. As I indicated previously in my testimony, it is Shawnee's belief that  
560 there would be little, if any, demand for wireline-to-wireless number portability  
561 by our customers. I have discussed the potential demand with other companies  
562 and advisors and have taken into account the demand estimates I made for  
563 Madison and which were made by the other small companies in the dockets that  
564 were previously heard. I have decided in consultation with the Shawnee  
565 management that the estimates used by Madison and the other small companies in



the other dockets (which have already been reviewed by the Staff) are reasonable, and Shawnee is using the same estimates.

The estimate contained in the exhibit and which we are making for this proceeding is that 6% of Shawnee's access lines would port to a wireless carrier in the first year we implement wireline-to-wireless number portability and that 1% more would port in each of the second, third, fourth and fifth years so that by the end of the fifth year, 10% would have ported.

We then examined Shawnee's internal data concerning originating and terminating minutes of use for local calls made by Shawnee's customers and the average call duration for local calls. Using this data and with the assumption that all of the customers who ported to a wireless carrier were typical with regard to the volume and duration of calls they would receive and would be the same as our average customer, we projected the number of calls and minutes of use that would need to be queried, transported and transited to wireless carriers over the five year time horizon. This information was then used in estimating both the query expenses and the transport and transiting expenses.

Q. Taking into account your previous response, how was the amount of the query expense over the five years determined?

A. Based upon discussions we have had, it is our current understanding that Shawnee would put triggers into its switch that would result in only calls to ported numbers

589 being required to be queried. The rate per query dip has been obtained from a  
590 vendor and the projected demand was developed as described above. Based upon  
591 our present understanding, the query expense is relatively minimal.

592

593 Q. Please describe the estimates included for transport and transit.

594 A. Differing from the query expense, the transport and transit costs are more  
595 significant. As I indicated earlier, we have used the rates and rate elements that  
596 we understand Verizon would charge and Shawnee's access rates for the transport  
597 and transiting of calls to Verizon's Carbondale tandem for delivery to wireless  
598 carriers. Like the query costs, the transport and transit costs grow from year to  
599 year based upon the estimates of how many customers will have ported their  
600 numbers to wireless carriers in each of the first five years. The query and  
601 transport and transiting costs, as well as many of the other expenses, would  
602 continue on and could potentially grow beyond the five year time horizon  
603 included within the exhibit.

604

605 Q. Was the FCC concerned about transport recovery for small rural ILECs when it  
606 issued intermodal LNP in November?

607 A. Yes, most definitely. First and foremost, it is the intention of the Company in  
608 filing for this extension to allow time for the FCC and the Federal Courts to  
609 clarify a number of these issues. Speculating on the outcome of the pending FCC  
610 FNPRM and court appeals for clarification on the current Order does not seem  
611 productive. Second, Shawnee is not asking the ICC to determine or answer the

problematic issues created by the FCC intermodal LNP Order. Finally, the FCC cost recovery correctly allows for the recovery of any and all costs that are directly related to LNP, as it should.

Q. If a higher number of customers port to wireless carriers than you have projected in your estimates, what would be the impact on the estimates you are presenting?

A. If a higher number of customers port resulted in higher call volumes, we will have underestimated both transport and transit costs, as well as the query costs. Shawnee would also have fewer access lines over which to recover any costs, and the costs per subscriber per month would be higher than that reflected on Attachment 1.

Q. If on the other hand Shawnee's belief is correct that there is little or no demand for wireline-to-wireless number portability, what would be the impact?

A. If that is correct, we would have overestimated variable costs, such as transport and transit and query charges. However, the initial start-up investments and expenses would remain as well as certain ongoing expenses. In Shawnee's view, until there is a proven demand, those expenses and investments should not be incurred and they would, in fact, in some ways be even more unfair and burdensome on Shawnee's customers to make them pay for the costs for a service (although the costs would be lower), which they do not desire.

635 Q. Please comment on the expense line labeled "regulatory/legal/admin/order  
636 processing".

637 A. Based upon our discussions with counsel and the other small companies, we have  
638 estimated initial or start-up legal and regulatory costs in the amount of \$20,000.  
639 The estimate includes estimated fees from consultants and attorneys to negotiate  
640 service level agreements with wireless carriers, develop and file LNP tariffs, file  
641 company information with NeuStar and in the BIRRDs/LERG data bases,  
642 evaluate query and SOA providers, implement regulatory-compliant 911 methods  
643 and understand all regulatory requirements associated with intermodal LNP. The  
644 estimated regulatory/legal hours may be conservative considering that Shawnee  
645 does not have employees who are devoted to regulatory matters and that they  
646 outsource most regulatory work to consultants and attorneys.  
647 In subsequent years, the cost of processing a service order has been calculated to  
648 be \$40 per order based on the various work activities and personnel required to  
649 complete an LNP port request order. The demand figures previously discussed  
650 are then used in calculating the totals shown on the workpapers contained in  
651 Attachment 1. These costs were added to other general NPAC database costs  
652 related to LNP.

653

654 Q. Please explain the "Employee Education" expense, which you have included on  
655 the Attachment.

656 A. Siemens has indicated that technical training can be provided to technical  
657 personnel through the use of a video they have developed, which is a cost of

658 \$175. I have included that \$175 cost but have not allocated any employee time  
659 with regard to the technical training at this point. In addition, non-technical  
660 employees would need to be trained. Shawnee has estimated that the training  
661 would cost \$300 per employee for 34 employees initially. There would be  
662 ongoing employee training over the years, and we have estimated that training to  
663 cost \$900 per year.

664

665 Q. Please discuss the line item entitled "Technical Trouble", which I understand  
666 includes technical support to implement the local number portability process and  
667 would involve ongoing operational or technical issues related to the provision of  
668 local number portability.

669 A. This is an estimate based upon Shawnee's experience with similar issues and  
670 services and our discussion with other small company representatives concerning  
671 these types of costs. We have projected total technician time and estimated labor  
672 rates over the entire five year period and then spread the cost, in part, between  
673 start-up costs with the remaining amounts being incurred over each of the five  
674 years.

675

676 Q. Please provide the basis for the estimated costs related to "customer education".

677 A. If Shawnee were required to implement wireline-to-wireless number portability, it  
678 is the view of Shawnee's management that there would need to be at least two  
679 customer education mailing pieces prior to its implementation and that Shawnee  
680 would then need to have two ongoing mailings for customer education purposes

each year. Based upon the costs of previous pre-prepared mail pieces and our discussions with other companies, Shawnee is estimating that the costs of a mailing to each customer is 75¢ per mailing, which once again would occur twice each year. In looking at page 1 of Attachment 1, you can see that costs decline per year because of our assumption that we would have fewer access lines as time goes by as a result of certain customers porting their numbers to wireless carriers, as previously discussed.

Q. Describe in detail the type of customer education Shawnee proposes to undertake.

A. Since Shawnee is seeking a suspension of any obligation it may have to provide wireline-to-wireless local number portability, specific customer information pieces have not, as yet, been developed. However, as indicated in my prior answer, the Company intends to send out customer education mailing pieces prior to any time it is required to implement wireline-to-wireless local number portability and to continue the education process with follow-up mailings that the Company believes to be necessary. (Response to Staff Data Request 1.19)

Q. Describe the purpose and content of the customer education that Shawnee intends to provide.

A. Once again, since the Company is seeking a suspension of any obligation it may have to provide wireline-to-wireless local number portability, the specific content of any customer education pieces have not been developed at this time. The Company would tend to get informational pieces perhaps developed by larger

704 companies and provided to their customers for use in developing appropriate  
705 mailing pieces. The purpose of the customer education would be first and  
706 foremost to provide information concerning what wireline-to-wireless number  
707 portability is and to provide information to the customer concerning what steps  
708 they would need to take if they desired to port their landline number to a wireless  
709 telephone. Once again, Shawnee, as a small company, intends to rely upon  
710 information developed by larger companies, trade associations, etc. in developing  
711 appropriate customer education pieces should they become necessary. (Further  
712 Response to Staff Data Request 1.19)

713  
714 Q. Am I correct that present value calculations were performed as reflected on page  
715 1 of Attachment 1?

716 A. Yes, that is correct.  
717

718 Q. Does that complete your discussion of Attachment 1 and Shawnee's estimates of  
719 the incremental costs involved to it and the potential amounts that would need to  
720 be recovered from Shawnee's customers if required to implement wireline-to-  
721 wireless number portability?

722 A. Yes, it does. I should emphasize that the cost estimates are based upon what is  
723 known today and take into account the estimates and assumptions we have made.  
724 Other companies may be able to include additional estimated costs, which I have  
725 not included within the Shawnee exhibit, and to that extent, the estimated costs  
726 contained in Attachment 1 may well be low.

727

728 Q. In regard to the relief that Shawnee is seeking in this proceeding, is Shawnee  
729 asking the Commission to enter an Order in this docket permanently suspending  
730 any obligation that Shawnee may have to provide wireline-to-wireless local  
731 number portability?

732 A. No, Shawnee is not.

733

734 Q. Please describe the relief that Shawnee is requesting.

735 A. Shawnee is requesting a suspension of any obligation it may have to provide  
736 wireline-to-wireless local number portability for a period of 2½ years or 30  
737 months from May 24, 2004 to November 24, 2006. That is the length of  
738 suspension that both individual small companies and the Staff have recommended  
739 in the five proceedings that were previously heard and which I have referenced in  
740 my testimony. After discussions with Shawnee's management and its advisors,  
741 Shawnee believes that the recommendations made by both the companies and the  
742 Staff in those proceedings are not only reasonable but are reflective of Shawnee's  
743 situation, as well.

744

745 Q. Does that conclude your direct testimony?

746 A. Yes, it does.

747



**Shawnee Telephone Company**  
**LOCAL NUMBER PORTABILITY DATA SUMMARY**

	Initial LNP Start-Up Cost	Year 1	Year 2	Year 3	Year 4	Year 5	Total LNP Cost Projections
<b>INVESTMENTS</b>							
LNP Software	\$ 46,938	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 46,938
OSS	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Voice Announcements	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Switch Translations	\$ 3,000	\$ -	\$ -	\$ -	\$ -	\$ -	\$ 3,000
LNP Hardware	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
LNP Transport Hardware	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
-	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
<b>EXPENSES</b>							
Query	\$ -	\$ 1,659	\$ 1,935	\$ 2,211	\$ 2,488	\$ 2,764	\$ 11,057
Transport and Transit	\$ -	\$ 77,491	\$ 90,406	\$ 103,321	\$ 116,236	\$ 129,151	\$ 516,604
Regulatory/Legal/Admin/Order Processing	\$ 20,000	\$ 14,362	\$ 5,310	\$ 5,310	\$ 5,310	\$ 5,310	\$ 55,604
Employee Education	\$ 10,375	\$ 900	\$ 900	\$ 900	\$ 900	\$ 900	\$ 14,875
Technical Trouble	\$ 10,000	\$ 7,500	\$ 7,500	\$ 7,500	\$ 7,500	\$ 7,500	\$ 47,500
Customer Education	\$ 6,789	\$ 6,382	\$ 6,314	\$ 6,246	\$ 6,178	\$ 6,110	\$ 38,018
<b>Sub-Totals</b>	\$ 97,102	\$ 108,293	\$ 112,365	\$ 125,488	\$ 138,612	\$ 151,736	\$ 733,596
Present Value Factors	100.0000%	89.8876%	80.7979%	72.6273%	65.2830%	58.6813%	
<b>Present Value Total Cost Projections</b>	<b>\$ 97,102</b>	<b>\$ 97,342</b>	<b>\$ 90,788</b>	<b>\$ 91,139</b>	<b>\$ 90,490</b>	<b>\$ 89,040</b>	<b>\$ 555,902</b>
<b>Access Lines</b>							<b>3,066</b>
<b>Months</b>							<b>60</b>
<b>Annual Expense per subscriber per month</b>							<b>\$ 3.02</b>

1 Unless otherwise indicated, all data is from year-end 2002:

2	<b>Shawnee Telephone Company</b>	<b>341025</b>
3	<b>I-CO Data</b>	
4	PBX Lines	0
5	ISDN-PRI Lines	0
6	Other Access Lines	4,526
7	Host Offices	1
8	Local MOU- Tandem 1	
9	Local MOU- Tandem 2	44,556,000
10	Number of Employees	34
11	Number of End Offices Requiring Translations	1
12	RIC	\$ 0.020520
13	Tandem Switched Transport	\$ 0.007300
14		
15	<u>Tandem 1 Transiting Rates</u>	
16	Tandem Switching	\$ 0.004836
17	Tandem Transport	\$ 0.000189
18	Tandem Transport Facility	\$ 0.000093
19		
20	<u>Tandem 2 Transiting Rates</u>	
21	Tandem Transiting	0.0011662
22	Tandem Transport	
23	Tandem Transport Facility	
24		
25	<u>Assumptions</u>	
26	Average Holding Time Per Local Call	5.00
27	LNP Query Charge	\$ 0.003102
28	Present Value Factor, Year 1	0.89888
29	Present Value Factor, Year 2	0.80798
30	Present Value Factor, Year 3	0.72627
31	Present Value Factor, Year 4	0.65283
32	Present Value Factor, Year 5	0.58681
33	Wireless Penetration, Year 1	6%
34	Wireless Penetration, Year 2	7%
35	Wireless Penetration, Year 3	8%
36	Wireless Penetration, Year 4	9%
37	Wireless Penetration, Year 5	10%
38	Regulatory/Legal Fee Per Hour	\$ 200
39	Regulatory/Legal Hours, Year Zero	100
40	Customer Education, Cost Per Mailing	\$ 0.75
41	Customer Education, Number of Mailings Per Year	2
42	Employee Education, Cost Per Employee	\$ 300.00
43	Employee Education, Number Of Employees Per Year, 1-5	3
44	Cost Per Translation Per Office	\$ 3,000
45	Technical Cost Per Hour	\$ 50.00
46	Technical Hours, Year Zero	200
47	Technical Hours Per Year, 1-5	150
48	LNP Adminstration, Annual Fee	\$ 3,500
49	LNP Order Processing Fee Per Ported Number	\$ 40.00
50	Software Cost	\$ 46,938.00
51	Number of Employees Needing Technical Training	1
52	Cost Per Technical Training Per Employee	175

**LOCAL NUMBER PORTABILITY DATA**  
**FOR DEVELOPMENT OF LNP END USER AND QUERY CHARGES**

<b>COMPANY NAME</b>	<b>Shawnee Telephone Company</b>
<b>STUDY AREA NUMBER</b>	<b>341025</b>

<b>AVERAGE MONTHLY LINES</b>		<b>YEAR</b>					
	<b>0 (Current)</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	
1. PBX	0	0	0	0	0	0	
2. ISDN-PRI	0	0	0	0	0	0	
3. Other (Sum of Residential, Single Line Business, Multiline Business, Centrex)	4,526	4,254	4,209	4,164	4,119	4,073	
3a <b>TOTAL</b>	<b>4,526</b>	<b>4,254</b>	<b>4,209</b>	<b>4,164</b>	<b>4,119</b>	<b>4,073</b>	
3b <b>Present Value Access Line</b>	<b>4,526</b>	<b>3,824</b>	<b>3,401</b>	<b>3,024</b>	<b>2,689</b>	<b>2,390</b>	

<b>INVESTMENTS</b>		<b>YEAR</b>					
	<b>0 (Current)</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	
4. Software Upgrades Total: (Please also itemize below, and provide descriptions in the right-most column)	\$49,938	\$0	\$0	\$0	\$0	\$0	
4a. LNP Software	\$46,938						
4b. OSS	\$0						
4c. Voice Announcements	\$0						
4d. Switch Translations	\$3,000						
5. Hardware & Other (Please list items below)							
5a. LNP Hardware	\$0						
5b. LNP Transport Hardware	\$0						
5c.							
5d.							
<b>TOTAL</b>	<b>\$49,938</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	

<b>EXPENSES (Maintenance etc.)</b>		<b>YEAR</b>					
	<b>0 (Current)</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	
6. Please list items below							
6a. Regulatory/Legal/Admin/Order Processing	\$ 20,000	\$ 14,362	\$ 5,310	\$ 5,310	\$ 5,310	\$ 5,310	
6b. Employee Education	\$ 10,375	\$ 900	\$ 900	\$ 900	\$ 900	\$ 900	
6c. Technical Trouble	\$ 10,000	\$ 7,500	\$ 7,500	\$ 7,500	\$ 7,500	\$ 7,500	
6d. Customer Education	\$ 6,789	\$ 6,382	\$ 6,314	\$ 6,246	\$ 6,178	\$ 6,110	
<b>TOTAL</b>	<b>\$47,164</b>	<b>\$29,144</b>	<b>\$20,024</b>	<b>\$19,956</b>	<b>\$19,888</b>	<b>\$19,821</b>	

1 **Shawnee Telephone Company**

2 Transport Costs - Tandem 1

3	Year	Transit & Transport Expense
4	1	\$ -
5	2	\$ -
6	3	\$ -
7	4	\$ -
8	5	\$ -
9	Total	\$ -

10  
11 Transport Costs - Tandem 2

12	Year	Transit & Transport Expense
13	1	\$ 77,491
14	2	\$ 90,406
15	3	\$ 103,321
16	4	\$ 116,236
17	5	\$ 129,151
18	Total	\$ 516,604

19  
20 Query Dip Charges

21	Year	Query Charge
22	1	\$ 1,659
23	2	\$ 1,935
24	3	\$ 2,211
25	4	\$ 2,488
26	5	\$ 2,764
27	Total	\$ 11,057

units cost per Total

4a.	LNP Software	1	\$ 46,938.00	\$ 46,938	Vendor Quote
4b.	Billing Software	1	\$ -	\$ -	
4d.	Switch Translations	1	\$ 3,000.00	\$ 3,000	Quote from Engineer
5.	Hardware & Other (Please list items below)				
5d.					

6.	<b>EXPENSES</b>				
	Please list items below				
6a.	Regulatory/Legal/Admin/Cust Svc	yr1	100.00	\$ 200.00	\$ 20,000 Projected
	yr1-5	Admin	5.00	\$ 3,500.00	\$ 17,500 Projected
	yr1		272	\$ 40.00	\$ 10,862 Projected
	yr2-4		181	\$ 40.00	\$ 7,242 Projected
6b.	Employee Education	Tech	1.00	\$ 175.00	\$ 175 Quote from Vendor
		Others	34.00	\$ 300.00	\$ 10,200 Projected
6c.	Technical Support/Processing/Trouble	tech	200.00	\$ 50.00	\$ 10,000 Projected
			150.00	\$ 50.00	\$ 7,500 Projected
6d.	Customer Education		4,526.00	\$ 0.75	\$ 6,789 Projected



Verizon Wireless  
2785 Mitchell Drive MS 7-1  
Walnut Creek, CA 94598

November 18, 2003

**IMMEDIATE ATTENTION REQUESTED**

Shawnee Telephone Co.  
120 W. Lane St.  
Equality, IL 62934

Re: Local Number Portability

Dear James Coyle:

The FCC has recently reiterated the pre-existing deadlines for local number porting for wireless and wireline carriers operating outside the Top 100 MSAs, effective May 24, 2004. Verizon Wireless Cellco Partnership d/b/a Verizon Wireless would like to begin to complete a Service Level Agreement (SLA) to ensure a smooth transition to number portability by establishing procedures to govern the exchange of information during the porting process. Specifically, an SLA would serve several purposes: memorialize the intercarrier communications processes that the two carriers intend to follow, capture appropriate porting center and trouble contacts, and contain the parties' agreement to successfully facilitate porting customers. If you have not already received a copy of our SLA, you can obtain one by contacting Sharon Cañas at 925-279-6122 or email [Sharon.Canas@VerizonWireless.com](mailto:Sharon.Canas@VerizonWireless.com).

If negotiating an SLA is not possible in the next few weeks before the LNP deadline, Verizon Wireless's immediate concern is in obtaining, at minimum, a Trading Partner Profile (TPP). The TPP would provide basic factual information necessary to accomplish portability and would include those entities covered by the profile and any back-office or porting center contacts. Verizon Wireless plans to integrate this information into its information systems and also provide it to personnel staffing our porting center. Whether or not an SLA is ultimately executed, sharing this type of factual information is necessary to facilitate porting as well as fallout resolution. In this regard, we have enclosed a copy of the TPP with appropriate contact information.

Please include a response to this request along with a point of contact for provision of TPP information and/or SLA discussions in a letter or email addressed to the undersigned. Thank you for your immediate attention and cooperation.

A handwritten signature in cursive script, appearing to read "Linda Godfrey".

Linda Godfrey  
Member of Technical Staff  
Interconnection Numbering and Mandates  
Headquarters Network Operations Staff

Enclosure

## **WIRELINE TRADING PARTNER PROFILE**

### **Table of Contents**

**Part A –Trading Partner Profile**

**Part B – General Contact Information and Trouble Reporting Contact Information**

**Part C – Trouble Ticket Detail**

**Part D – Porting Validation Standards**

**Part E – Affiliate Lists**

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**Part A**  
**Trading Partner Profile**

**For Verizon Wireless:**

Company Name – Verizon Wireless (Verizon Wireless Affiliates are identified in Part E hereto)  
Administrative OCN – G056

**OCN LIST FOR VERIZON  
WIRELESS**

STATE	OCN	STATE	OCN
AL	6804	MT	6564
AR	6805	NE	5807
AZ	6572	NC	6324
CA	6006	ND	6568
CO	6567	NH	6386
CT	6388	NV	6458
DC	6402	NJ	6391
DE	6393	NY	6959
FL	6502	NM	6573
GA	6540	OH	6025
HI	6516	OK	5813
IA	6570	OR	6523
ID	6565	PA	6392
IL	6333	RI	6389
IN	6725	SC	6398
KS	6532	SD	6569
KY	6500	TN	6673
LA	6505	TX	6506
ME	6386	UT	6571
MA	6387	VA	6827
MD	6395	VT	6390
MS	6396	WV	6394
MO	5814	WA	6246
MN	5816	WI	6508
MI	6003	WY	6566



Verizon Wireless Service Order Activation System SPID – 6006  
 Verizon Wireless Local Service Management System SPID – 0572, 6827

Address – Port Center  
 300 River Rock Blvd.  
 Murfreesboro, TN 37128  
 Country – USA

**For Wireline Carrier B:**

Company Name – [Wireline Carrier B to provide list of Affiliates on Part E]

[Wireline Carrier B to insert OCNs with associated states here and to complete items on the table below]

Address – [insert address]  
 [insert address]  
 Country – USA

CONTACT	Item	Verizon Wireless	Wireline Carrier B
	Effective Date		
	<b>Note:</b> The above contact is also assumed to be the first point of contact for profile changes.		
	Contact name for Wireline Carriers	Verizon Wireless Port Center	
	Contact description	Port Center – General Information	
	Phone number	1-800-488-2002 (not available until 11/24/03)	

OPERATIONS	Item	Verizon Wireless	Wireline Carrier B
	... Common information for testing and production environments ...		
	Administrative OCN	G056	
	Administrative Authorized Exchange Carrier Name (if applicable)	EBAW	
	Holiday Days (List Days)	N/A	
	Holiday time begin (hh:mm)	N/A	
	Holiday time end (hh:mm)	N/A	
	... for Testing ...		

Service Provider SOA ID (SPID)	6006	
LSMS SPID	0572, 6827	
WPR / LSR Version ID	Preference to latest industry-supported version. WPR is for WLS-WLN porting, LSR is for WLN-WLS.	
WPRR / FOC Version ID	Preference to latest industry-supported version.	
Time Zone (PST, MST, CST, EST)	Coordinated per Time Zone, per contact information in Part B.	
Business days (Sun, Mon, etc.)	Testing to be coordinated per contact information in Part B	
Business day begin (hh:mm)	Testing to be coordinated per contact information in Part B	
Business day end (hh:mm)	Testing to be coordinated per contact information in Part B	
... for Production ...		
Service Provider SOA ID (Verizon Wireless SPID)	6006	
LSMS SPID	0572, 6827	
WPR / LSR Version ID	LSOG (most current version) WPR is for WLS-WLN porting, LSR is for WLN-WLS.	
WPRR / FOC Version ID	LSOG (most current version)	
Time Zone (PST, MST, CST, EST)	24x7x365	
Business days (Sun, Mon, etc.)	24x7x365	
Business day begin (hh:mm)		
Business day end (hh:mm)		

C	Item	Verizon Wireless	Wireline Carrier B
O	... for Testing ...		
R	Porting Method: Primary, Secondary, N/A	Current, Test Env = Telcordia SMG 4.2.0.50 (WICIS 2.x)	
B	ICP Package/Application ("send to")	SMG 4.2: 205.174.188.227	
A	ICP Physical Server ("receive from")	SMG 4.2: 205.174.188.229	
	Failover ICP Server	SMG 4.2: 205.174.188.228	
	SOA Application	SMG 4.2: 205.174.188.226	